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VIA ELECTRONIC COMMENT FILING SYSTEM

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Meeting
Expanding Flexible Use of the 3.7 to 4.2 GHz Band
GN Docket No. 18-122

Dear Ms. Dortch:

This letter provides notice to the Federal Communications Commission (“FCC” or “Commission”) under 47 C.F.R. § 1.1206, that on March 24, 2020, representatives of Intelsat US LLC (“Intelsat”) and the company’s undersigned counsel participated in a teleconference with members of the FCC staff – listed below – in which Intelsat sought clarification on a number of discrete topics in the recently released C-band Report and Order.¹ The Intelsat representatives noted that the company is evaluating the C-band Order and has not yet made a determination as to whether to accept acceleration payments. A thorough understanding of the terms, process and implementation requirements is critical for space station operators to evaluate the feasibility of participating in the accelerated relocation process.

The Intelsat participants included the undersigned; Michael DeMarco, EVP and Chief Services Officer; Tom McNamara, Vice President, Enterprise Program Management; Susan Crandall, Associate General Counsel; and Kurt Riegelman, Senior Commercial Advisor. The FCC teleconference participants included Kerry Murray and Thomas Sullivan of the International Bureau; Aaron Goldberger of the Office of Chairman Pai; Jonathan Campbell and Giulia McHenry of the Office of Economics and Analytics; and Anna Gentry, Matthew Pearl, and Paul Powell of the Wireless Telecommunications Bureau.

During the teleconference, the Intelsat representatives focused their questions on discrete topics and sought discussion on certain operational aspects of the C-band Order. For example,

¹ Expanding Flexible Use of the 3.7-4.2 GHz Band, *Report and Order and Order of Proposed Modification*, GN Docket No. 18-122, FCC-20-22 (Mar. 3, 2020) (hereinafter “C-band Order”).

the Intelsat participants highlighted at least one use case that was not addressed by the clearing costs reimbursement process outlined in the C-band Order, seeking clarification of the FCC's intentions in that circumstance. Specifically, the Intelsat participants explained that a space station operator's programming customer may wish to procure, purchase and install certain equipment for a High Efficiency Video Coding ("HEVC") upgrade at its uplink location on its own accelerated timetable. The Intelsat representatives noted that the C-band Order appears only to permit space station and earth station operators to submit costs to the Clearinghouse. The Intelsat representatives sought guidance on whether a customer – that is neither a space station operator nor an earth station operator – could submit costs directly to the Relocation Payment Clearinghouse or whether the customer's space station operator would be required to purchase the equipment on a customer's behalf and seek reimbursement.

The Intelsat participants also discussed the need to understand when the FCC anticipates making available a complete list of "eligible earth stations" as duly registered in the IBFS database. Intelsat highlighted the fact that it is aware there are technical errors in some registered earth station's database information, including for example, bad latitude and longitude coordinates. Intelsat queried the FCC as to how satellite operators should expect to handle situations where the earth station location in IBFS does not match the actual earth station location.

The Intelsat representatives further noted their agreement with others' suggestion that the identity of opt-out earth stations be determined as quickly as possible and asked how the FCC intends to classify earth stations that fail to make lump sum payment elections before the deadline set by the Wireless Telecommunications Bureau. The Intelsat representatives suggested that the FCC publish the lump sum payment election by each eligible earth station so that space station operators, in fulfilling their obligation to coordinate the relocation, may compare that to their own associated site lists, as well as have adequate time to reflect this information in their Transition Plans.

An additional issue raised by the Intelsat representatives was the lack of clarity in the C-band Order concerning the ability for space station operators to register new antennas when they relocate Telemetry, Tracking, and Command ("TT&C") sites after the consolidation required by the C-band Order. Specifically, the C-band Order states that no applications for new earth station registrations will be accepted. If this direction were to be applied to space station operators that may need to move TT&C antennas to new sites, it would be detrimental to the process of providing the necessary protections to these new TT&C antennas that are specifically envisioned by the C-band Order.

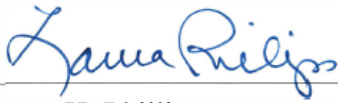
The Intelsat representatives also asked the FCC to clarify how the satellite operators are to treat C-band antennas that are used by government entities but that are not registered in the IBFS database. Clarifying whether those operations may be eligible for compensation and covered by the Transition Plan under the C-band Order would directly affect space station operators' obligations in the relocation process. As Intelsat has little, if any, visibility into the locations and extent of these operations, it would not be in a position to undertake the filtering of these particular antennas.

The Intelsat representatives also observed that given the drafting of the C-band Order whereby individual space station operators are tasked with clearing their customers and associated earth stations individually rather than collectively, it may not be necessary to have a Relocation Coordinator.

Finally, the Intelsat representatives noted that some of its vendors are reporting current or anticipated domestic and international supply chain and production challenges as a result of the coronavirus pandemic. Intelsat highlighted how the continued public health emergency may cause as yet unknown delays in the timelines contemplated by the C-band Order that are beyond the ability of space station operators to control.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,



Laura H. Phillips

Counsel for Intelsat US LLC

cc: Jonathan Campbell
Anna Gentry
Aaron Goldberger
Giulia McHenry
Kerry Murray
Matthew Pearl
Paul Powell
Thomas Sullivan